

Comments of National Congress of American Indians
Date: September 16, 2004

The National Congress of American Indians hereby submits the following Comments in Support of the Petitions of Tracfone Wireless, Inc., CC 96-45 and AT&T to increase the access of low-income people to competitive telecommunications services. In particular, we support the inclusion of wireless providers and resellers as eligible telecommunications carriers in (“ETC”) in the Lifeline Universal Service Program for the reasons stated below in order to provide services to qualifying low-income consumers.

The National Congress of American Indians (NCAI) was founded in 1944 and is the oldest and largest tribal government organization in the United States. NCAI serves as a forum for consensus-based policy development among its membership of over 250 tribal governments from every region of the country. NCAI is actively involved in bringing telecommunications and information technology capabilities to Indian Country.

Despite the media attention on new wealth some tribes have enjoyed from Indian gaming, the reality is that Indian reservations have a 31 percent poverty rate - the highest poverty rate in America. Indian unemployment is approximately 46 percent. Indian health, education and income statistics are the worst in the country. While a handful of tribes have achieved a measure of success, the vast majority of tribes are mired in a severe economic depression caused by decades of oppression. Tribes are striving to achieve economic stability and self-sufficiency and using the growing tools of self-governance. Access to reliable telecommunications technology is necessary. As other communities focus on bringing Internet connectivity to their citizens, many American Indians and Alaska Natives have yet to be connected to a basic telephone network. The wireless

services and access to services requires that infrastructure be in place. For instance, access to cell phones can only happen when towers are strategically located, which has not occurred in many remote areas.

In today's rapidly evolving telecommunications marketplace, wireless phone service is for many low income American Indians a better option for phone service than traditional wireline. Low-income individuals often travel long distances to work, and many have no access to telephones while on the job. Many work several jobs and rely on cell phones to keep in touch with their children, with health care providers, schools, and emergency services; others have additional responsibility for elderly family members and grandchildren. Job seekers need a means for scheduling interviews and quickly returning calls from prospective employers; seniors and people with disabilities and serious illnesses rely on cell phones for security and access to emergency services. Many low-income people, including migrant workers, are extremely transient, move frequently, and do not have resources to have a landline installed with each relocation. For the homeless, a wireless phone may be their only means of access to their "own" phone and the only way that those providing essential services such as healthcare can locate them.

Lifeline was created to ensure that all Americans would have access to telecommunications services. To fully achieve that goal in the twenty-first century, low-income people should have access to competitive wireless services of all kinds, including the prepaid wireless services described in the Tracfone petition. Prepaid services in particular hold promise for low income people because there are no long term contracts

that may be difficult to honor, no additional charges for late payment and very often, as set out in the Tracfone petition, provide additional services like voice mail and long distance at no additional charge.

We believe that expanding the carrier choices for low income people to all carriers that are willing to meet the service requirements—including wireline and wireless, facilities-based and resellers—is in the public interest. It would bring the same choices and consumer benefits to low-income people that are available to all other Americans, and would play an essential role in lowering costs to low income consumers and increase participation of eligible Americans in the Lifeline Program.